

uncertainty. . . .”⁶⁷ The expertise NECA has gained in fulfilling its responsibilities as administrator of the Universal Service Fund, the Commission’s Lifeline Assistance programs, the interstate TRS fund, the Vermont USF fund and the interstate access charge pools is not likely to be found in some other entity, particularly one that has no existing relationships with any industry participants.⁶⁸

Similarly, Fred Williamson & Associates, Inc. (FW&A) states that it

supports the continued administration of any Universal Service support programs by NECA - for any new or additional support mechanism programs that are implemented relative to the 1996 Act. We believe that NECA has done an overall efficient, competent, and ‘neutral’ job of implementing existing FCC rules and regulations, for not only current Universal Service Funding mechanisms, but also for other funding mechanisms, such as Telecommunications Relay Service, assigned to it by the FCC. FW&A sees no advantage to the establishment of any new and costly organization, or authority, to carry out these functions, and which could provide the ability to fairly, and equitably administer (at reasonable costs) those functions provided today by NECA. Since the 1996 Act mandates that telecommunication carrier contributions are to be extended beyond those which currently contribute, it is logical that the organization currently administering existing programs be continued as the administrator of existing and new universal support programs.⁶⁹

Other parties comment on the issue of NECA’s neutrality. For example, Evans Telephone Company, et. al. (seven small Western LECs filing joint comments) state that “[t]he obvious choice

⁶⁷ RTC at 19. See also Park Region at 4 (“[t]he art of administering funds which must be collected and distributed with the utmost of integrity and neutrality, requires walking a tight rope that can be very difficult. NECA’s experience gained over the past few years make it the only national administrator possessing the knowledge and efficiency to implement modification to the support mechanisms for the national good in the time frame afforded by the Act.”).

⁶⁸ Taking the concept of a “neutral” administrator to an extreme, one commenter (ACTA at 13) argues that the non-governmental body chosen should have no affiliations or “relationships” with any industry segment whatsoever, and would on this basis exclude accounting firms, banking institutions, management consulting firms, and other firms likely to be vendors of services or products to the telecommunications industry. Even assuming that an administrator fitting ACTA’s criteria was to apply, it would not be able to duplicate the level of expertise and efficiency that NECA has attained in handling support fund administration.

⁶⁹ FW&A at 18-19

is the National Exchange Carrier Association (NECA), which administers the current fund. NECA possesses the experience to handle the complexities of fund administration and does its job in an open and neutral manner.”⁷⁰

NECA recognizes that the universal service support programs mandated by the 1996 Act will have a broad constituency, including a wide range of contributors and receivers. To address concerns about participation in the process, NECA suggested in its comments that the Commission consider establishing a universal service advisory council to advise NECA with respect to fund issues.⁷¹ A universal service advisory council that included representatives of fund recipients, contributors, state regulators, and consumer representatives, with members selected by constituent groups, would allow all interested persons to have input into the process, and provide additional assurance that funds are distributed and collected in strict compliance with the Commission’s rules.⁷²

⁷⁰ Evans Telephone Company, et. al. at 14 (“[a]ttempting to administer these funds through a new, untried system would run the risk of replacing order with chaos.”)

⁷¹ NECA at 23. A similar council advises NECA with respect to TRS matters. As with the TRS council, this group could advise NECA with respect to universal service fund administration and NECA could provide reports on the advisory council’s deliberations to the Commission on a regular basis. See also North Dakota PSC at 4 (“universal service advisory council should be established, should be broad-based and should include state commissioners ”)

⁷² Several commenters advocate selection of an administrator based on competitive bidding. See, e.g., Frontier Corporation at 10; Telecommunications Resellers Assoc. at 14; Teleport at 17. Other commenters recognize, however, that even if there were other organizations with equivalent experience and expertise, a bidding process would not be meaningful at this early stage, since the scope and nature of the administrator’s tasks are not yet defined. See Florida PSC at 25 (“It is difficult to comment on who should administer the fund until it is determined what the fund will be. At this time, there are too many variables to consider ”); BellSouth at 24-25 (“it is necessary for the Joint Board to act to select a framework for the interstate universal service fund. Once the framework is selected, details around the framework can be filled out. The debate can shift from what the universal service fund should be to the calculation to the fund’s size and its administration.”)

IV. CONCLUSION

Universal service, long considered the “cornerstone” of our nation’s telecommunications policy, is now an explicit and vital part of the Communications Act. New section 254 of the Act requires the Joint Board and the Commission to base universal service policies on seven strongly-worded principals that focus on the nationwide availability of modern, high-quality services at just, reasonable and affordable rates, funded by specific, predictable and sufficient Federal and State mechanisms. These principles must be adhered to by the Commission. Efforts to nurture competition in the local exchange marketplace should not be allowed to undermine existing universal service achievements or the continued expansion of universal service. Continued uncertainty about the future of existing universal service mechanisms is itself harmful to universal service. Telephone companies are understandably reluctant to commit resources and investments in infrastructure until cost recovery issues are clarified.

In order to resolve these concerns, and satisfy the requirements of the 1996 Act, the Commission and Joint Board must act soon to propose specific rules for any new universal service programs. NECA believes that the existing record would support rule proposals that, at a minimum, (a) build on existing cost-based universal service mechanisms, including the Universal Service Fund and DEM weighting, while allowing exchange carriers to experiment with new costing methodologies such as proxies; (b) use the existing lifeline assistance programs as a model for funding any additional discounts on services for low-income consumers found to be in the public interest under the 1996 Act, as well as funding for discounts on services provided to schools, libraries and rural health care providers; (c) change the current PSL-based tariff methodology for collecting universal service support amounts to a revenue-based system with payments required by rule; and (d) continue NECA

as administrator of federal universal support programs.

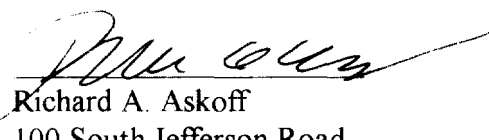
These steps will assure compliance with the universal service goals of the 1996 Act and enable the Commission to focus its resources on other critical issues (such as access reform) addressed in the 1996 Act and in industry changes.

Respectfully submitted,

NATIONAL EXCHANGE CARRIER
ASSOCIATION, INC.

Donna A. DiMartino
Regulatory Manager

By



Richard A. Askoff
100 South Jefferson Road
Whippany, New Jersey 07981

Its Attorney

May 7, 1996

Appendix A

List of Commenters and Abbreviations -- CC Docket No. 96-45

360° Communications Company (formally Sprint Cellular Company)
Access to Communications for Education (ACE) Coalition
Ad Hoc Telecommunications Users Committee (Ad Hoc)
Airtouch Communications, Inc.
Alabama Public Service Commission (Alabama PSC)
Alabama-Mississippi Telephone Association
Alaska (State of)
Alaska Library Association
Alaska Public Utilities Commission (Alaska PUC)
Alaska Telephone Association (Alaska Tel. Assoc.)
Alliance for Distance Education in California (ADEC)
Alliance for Public Technology (APT)
Allied Associated Partners, LP and Geld Information Systems
Association for Local Telecommunications Services (ALTS)
American Association of Community Colleges (AACC)
American Association of Retired Persons (AARP), et. al.
American College of Nurse Practitioners (ACNP)
American Federation of Teachers
American Foundation for the Blind
American Hospital Association, et. al.
American Library Association
American Telemedicine Association
America's Carriers Telecommunications Association (ACTA)
Ameritech
AMSC Subsidiary Corporation
Apple Computer, Inc.
Ardmore Telephone Company
Arizona, University of (Health Sciences Center)
Association of America's Public Television Stations
AT&T Corp. (AT&T)
Association Communications & Research Services (ACRS)
Bell Atlantic Corporation (Bell Atlantic)
BellSouth Corporation (BellSouth)
Benjamin N. Cardozo School of Law/Yeshiva University
Benton Foundation
Bledsoe Telephone Cooperative
Blountsville Telephone Company
Brite Voice Systems, Inc.
California Department of Consumer Affairs
California Library Association
California, People of the State of and Public Utilities Commission (California PUC)

California State Library
 Cellular Telecommunications Industry Association
 Center for Civic Networking, Inc. & Graduate School of Library & Information Science
 Century Telephone Enterprises and TDS Telecom (Century and TDS)
 Cheyenne River Sioux Telephone Authority and Golden West Telecommunications Coop
 Churchill County Telephone & Telegraph
 Cincinnati Bell Corporation (Cincinnati Bell)
 Citizens for a Sound Economy
 Citizens Utilities
 Colorado Independent Telephone Association, Inc. (Colorado Indep. Tel. Assoc.)
 Colorado Public Utilities Commission (Colorado PUC)
 Commercial Internet Exchange Association (CIX)
 Communications Workers of America
 Competitive Telecommunications Association (CompTel)
 Compuserve Incorporated
 Comsat Corporation
 Continental Cablevision, Inc
 Council of the Great City Schools
 Council on Competitiveness
 Department of Veterans Affairs
 Distance Delivery Consortium
 Early Childhood Development Center Legislative Coalition
 Edgemont Neighborhood Coalition, Dayton, Ohio
 Educom
 Evans Telephone Company, Humbolt Telephone Company, Kerman Telephone Co.,
 Oregon-Idaho Utilities, Inc., Pinnacles Telephone Company, Ponderosa Telephone Co.,
 Siskiyou Telephone Company, Volcano Telephone Company (Evans Telephone Company,
 et. al.)
 Farmers Telephone Cooperative
 Farnet
 Florida Cable Telecommunications Association
 Florida Public Service Commission (Florida PSC)
 Fort Mojave Telecommunications, Inc. (Fort Mojave Telecom.)
 Fred Williamson & Assoc. (FW&A)
 Frederick & Warinner
 Frontier Corporation (Frontier)
 General Communication, Inc. (GCI)
 General Services Administration (GSA)
 Georgia Public Utilities Commission (Georgia PSC)
 Governor of Guam
 GTE Corporation
 Guam Public Utilities Commission (Guam PUC)
 Guam Telephone Authority
 GVNW
 Harris, Skrivan & Associates, LLC (HSA)

Hart, Robert A.
 High Plains Rural Health Network
 Hispanic Information and Telecommunications Network, Inc.
 Hopper Communications Company
 ICORE, Inc. (ICORE)
 Idaho Public Utilities Commission (Idaho PUC)
 Illinois Commerce Commission
 Illinois State Board of Education, et. al.
 Independent Cable & Telecommunications Association (ICTA)
 Indiana Utility Regulatory Commission (Indiana URC)
 Information Industry Association
 Information Renaissance
 Information Technology Association of America & Electronic Messaging Association
 Information Technology Industry Council
 Instructional Telecommunications Council (ITC)
 Interactive Services Association
 International Communications Association
 Iowa Communications Network
 Iowa Telephone Association
 Iowa Utilities Board
 ITCs Inc.
 John Straurlakis, Inc. (JSI)
 Kentucky Department for Libraries and Archives
 Kentucky Public Service Commission (Kentucky PSC)
 Keystone-Authur Telephone Company
 Kinko's Inc.
 LCI International Telecommunications Corporation (LCI)
 LDDS WorldCom (LDDS)
 Learning and Information Networks for Community Telecomputing (LINCT)
 Lincoln Trail Libraries System
 Louisiana Public Service Commission (Louisiana PSC)
 Maddock Public School District No. 9
 Maine Public Utilities Commission, Montana Public Service Commission, Nebraska Public
 Service Commission, NewHampshire Public Utilities Commission, NewMexico State
 Corporation, Utah Public Service Commission, Vermont Department of Public Service
 and Public Service Board, and Public Service Commission of WestVirginia (Maine PUC
 et. al.)
 Massachusetts Board of Library Commissioners
 Matanuska Telephone Association
 MCI Telecommunications Corporation (MCI)
 Mendocino Unified School District
 Merit Network
 Metricom, Inc.
 MFS Communications Company, Inc. (MFS)
 Michigan Consumer Federation, et. al.

Michigan Library Association
Michigan, Library of
Michigan Public Service Commission (Michigan PSC)
Minnesota Independent Coalition
Minnesota Telephone Association (Minn. Tel. Assoc.)
Missouri Public Service Commission (Missouri PSC)
Missouri State Library
Mobilemedia Communications, Inc.
Mon-Cre Telephone Cooperative
Montana Hospital Association
Montana Independent Telecommunications Systems, Inc.
Montana Public Service Commission (Montana PSC)
Montana Telephone Association
Mountaineer Doctor TeleVision
National Association of Regulatory Utility Commissioners (NARUC)
National Association of State Utility Consumer Advocates (NASUCA)
National Association for the Advancement of Colored People (NAACP)
National Association of Development Organizations
National Association of Neonatal Nurses (NANN)
National Black Caucus of State Legislators Telecommunications & Energy Committee
National Cable Television Association (NCTA)
National Emergency Number Association (NENA)
National Retail Federation
National Rural Electric Cooperative Association (NRECA)
National School Boards Association, et. al.
National Urban League, Inc. (Boston College)
Navajo Nation
Nebraska Association of Hospitals and Health Systems
Nebraska Rural Development Commission
Netscape Communications Corporation
New Hope Telephone Cooperative
New Jersey Board of Public Utilities (New Jersey BPU)
New Jersey Division of Ratepayer Advocate
New Mexico Attorney General
New York Administrative Law Committee, Bar of the City of
New York, Public Utility Law Project of
New York State Board of Regents and State Education Department
New York State Consumer Protection Board
New York State Department of Public Service
North of Boston Library Exchange, Inc. (NOBLE)
North Dakota Department of Health
North Dakota Public Service Commission (North Dakota PSC)
Northern Mariana Islands
NYNEX Corporation (NYNEX)
Oakland Unified School District (Oakland, California)

Office of Rural Health Policy (ORHP) (HRSA/HHS)
 Ohio Consumers' Counsel
 Ohio Public Utilities Commission (Ohio PUC)
 Oklahoma Corporation Commission (Oklahoma Corp. Comm.)
 Oklahoma Department of Libraries
 OMB Watch
 Optel, Inc.
 Oregon and Washington Independent Telephone Associations (Oregon and Washington Tel. Assoc.)
 Oregon Public Utilities Commission (Oregon PUC)
 Pacific Telecom, Inc. (PTI)
 Pacific Telesis (Pacific Bell/Nevada Bell)
 Park Region Mutual Telephone Company (Park Region)
 Pennsylvania Public Utilities Commission (Pennsylvania PUC)
 Pennsylvania Rural Development Council
 People for the American Way, Alliance for Community Media, Alliance for Communications Democracy, Benton Foundation, Center for Media Education, League of United Latin American Citizens, Minority Media and Telecommunications Council, National Council of La Raza and National Rainbow Coalition (People for the American Way, et. al.)
 People's Counsel, District of Columbia, Office of the
 Personal Communications Industry Association (PCIA)
 Price, Bonnie
 Public Advocates, Inc. (National Council of La Raza, et. al.)
 Puerto Rico Telephone Company (PRTC)
 Ragland Telephone Company
 Reed Smith Shaw & McClay
 Rhode Island Public Utilities Commission
 Riley, Richard W. (Secretary of Education)
 Rock Port Telephone Company
 Rural Iowa Independent Telephone Association
 Rural Telephone Coalition (RTC) (Joint Comments filed by National Rural Telephone Association (NRTA), National Telephone Cooperative Association (NTCA), and the Organization for the Protection and Advancement of Small Telephone Companies (OPASTCO))
 Rural Telephone Finance Cooperative
 Rural Utilities Service
 Sailor (Maryland Library Project)
 Salmon, Dr. Edward H. (Commissioner of NJ BPU) (Separate Statement)
 Shawnee Telephone Company
 South Carolina Public Service Commission (South Carolina PSC)
 South Dakota, Governor (William J. Janklow)
 South Dakota Public Utilities Commission (South Dakota PUC)
 Southern New England Telephone Company (SNET)
 Southwest Montana Telepsychiatry Network
 Southwestern Bell Telephone Company (Southwestern Bell)
 Sprint Corporation (Sprint)

St. Alexius Medical Center
 STAR Program (System of Technology to Achieve Results)
 Syracuse University
 TCA, Inc. - Telecommunications Consultants
 Tele-Communications, Inc. (TCI)
 TELECOM Consulting Resources, Inc.
 Telecommunications Industries Analysis Project (TIAP)
 Telecommunications Industry Association (TIA)
 Telecommunications Resellers Association
 Teleport Communications Group (Teleport)
 Texas Advisory Commission on State Emergency Communications
 Texas Department of Information Resources
 Texas Office of Public Utility Counsel
 Texas Public Utility Commission (Texas PUC)
 Time Warner Communications Holdings, Inc. (Time Warner)
 Telefonica Large Distancia de Puerto Rico, Inc. (TLD)
 U S WEST
 U. S. Distance Learning Association
 United Church of Christ, et. al.
 United States Catholic Conference, et. al.
 United States Department of the Interior
 United States National Commission on Libraries and Information Science (REGDaily 4/10)
 United States Small Business Administration (United States SBA)
 United States Telephone Association (USTA)
 United Utilities, Inc. (United Utilities)
 UTC, The Telecommunications Association (UTC)
 Vanguard Cellular Systems, Inc.
 Virginia Corporation Commission (Virginia Corp. Comm.)
 Virginia's Rural Telephone Companies
 Warren Library Association
 Washington State Library
 Washington State - Superintendent of Public Instruction
 Washington Utilities & Transportation Commission
 Wavephore, Inc.
 West Virginia Consumer Advocate
 Western Alliance
 Western Wireless Corporation
 Winnebago Cooperative Telephone Association
 WinStar Communications, Inc.
 Wisconsin Department of Public Instruction
 Wisconsin Public Service Commission (Wisconsin PSC)
 Wyoming Public Service Commission (Wyoming PSC)

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Comments were served this 7th day of May 1996, by mailing copies thereof by United States Mail, first class postage paid, or by hand delivery, to the persons listed below.

By: Lenora Prosperi
Lenora Prosperi

The following parties were served:

Office of the Secretary*
1919 M Street, NW, Room 222
Federal Communications Commission
Washington, DC 20554
(Original and four copies;
two Extra Public Copies)

International Transcription Service (ITS)*
2100 M Street, NW, Room 140
Washington, DC 20037
(One copy)

Ernestine Creech*
Common Carrier Bureau
Accounting and Audits Division
2000 L Street, NW, Suite 257
Washington, DC 20554
(One diskette containing Comments
in WordPerfect 5.1 "Read Only" form)

The Honorable Reed E. Hundt, Chairman*
Federal Communications Commission
1919 M Street, NW, Room 814
Washington, DC 20554

The Honorable Rachelle B. Chong*
Federal Communications Commission
1919 M Street, NW, Room 812
Washington, DC 20554

The Honorable Susan Ness, Commissioner*
Federal Communications Commission
1919 M Street, NW, Room 832
Washington, DC 20554

The Honorable Julia Johnson, Commissioner
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

The Honorable Kenneth McClure, Vice Chairman
Missouri Public Service Commission
301 W. High Street, Suite 530
Jefferson City, MO 65102

The Honorable Sharon L. Nelson, Chairman
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

The Honorable Laska Schoenfelder, Commissioner
South Dakota Public Utilities Commission
500 E. Capital Avenue
Pierre, SD 57501

Martha S. Hogerty
Public Counsel for the State of Missouri
P.O. Box 7800
Harry S. Truman Building, Room 250
Jefferson City, MO 65102

Deborah Dupont, Federal Staff Chair*
Federal Communications Commission
Legal Branch
Accounting and Audits Division
2000 L Street, NW, Suite 257
Washington, DC 20036

Paul E. Pederson, State Staff Chair
Missouri Public Service Commission
P.O. Box 360
Truman State Office Building
Jefferson City, MO 65102

Eileen Benner
Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720-0074

Charles Bolle
South Dakota Public Utilities Commission
State Capital, 500 E. Capital Avenue
Pierre, SD 57501-5070

William Howden*
Federal Communications Commission
Cost Analysis Branch
Accounting and Audits Division
2000 L Street, NW, Suite 812
Washington, DC 20036

Lorraine Kenyon
Alaska Public Utilities Commission
1016 West Sixth Avenue, Suite 400
Anchorage, AK 99501

Debra M. Kriete
Pennsylvania Public Utilities Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Clara Kuehn*
Federal Communications Commission
Legal Branch
Accounting and Audits Division
2000 L Street, NW, Suite 257
Washington, DC 20036

Mark Long
Florida Public Service Commission
2540 Shumard Oak Blvd.
Gerald Gunter Building
Tallahassee, FL 32399-0850

Samuel Loudenslager
Arkansas Public Service Commission
P.O. Box 400
Little Rock, AR 72203-0400

Sandra Makeeff
Iowa Utilities Board
Lucas State Office Building
Des Moines, IA 50319

Philip F. McClelland
Pennsylvania Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

Michael A. McRae
D.C. Office of the People's Counsel
1133 15th Street, NW
Suite 500
Washington, DC 20005

Rafi Mohammed*
Federal Communications Commission
Cost Analysis Branch
Accounting and Audits Division
2000 L Street, NW, Suite 812
Washington, DC 20036

Terry Monroe
New York Public Service Commission
Three Empire Plaza
Albany, NY 12223

Andrew Mulitz*
Federal Communications Commission
Legal Branch
Accounting and Audits Division
2000 L Street, NW, Suite 257
Washington, DC 20036

Mark Nadel*
Federal Communications Commission
Common Carrier Bureau
1919 M Street, NW, Room 544
Washington, DC 20554

Gary Oddi*
Federal Communications Commission
Audits Branch
Accounting and Audits Division
2000 L Street, NW, Suite 257
Washington, DC 20036

Teresa Pitts
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Jeanine Poltronieri*
Federal Communications Commission
Legal Branch
Accounting and Audits Division
2000 L Street, NW, Suite 257
Washington, DC 20036

James Bradford Ramsay
National Association of Regulatory Utility
Commissioners
1201 Constitution Avenue, NW, Suite 1102
Washington, DC 20423

Jonathan Reel*
Federal Communications Commission
Legal Branch
Accounting and Audits Division
2000 L Street, NW, Suite 257
Washington, DC 20036

Brian Roberts
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Gary Seigel*
Federal Communications Commission
Cost Analysis Branch
2000 L Street, NW, Suite 812
Washington, DC 20036

Pamela Szymczak*
Federal Communications Commission
Legal Branch
Accounting and Audits Division
2000 L Street, NW, Suite 257
Washington, DC 20036

Whiting Thayer*
Federal Communications Commission
Cost Analysis Branch
Accounting and Audits Division
2000 L Street, NW, Suite 812
Washington, DC 20036

Deborah S. Waldbaum
Colorado Office of Consumer Counsel
1580 Logan Street, Suite 610
Denver, Colorado 80203

Alex Belinfante*
Federal Communications Commission
Industry Analysis Division
Common Carrier Bureau
2033 M Street, NW, Suite 500
Washington, DC 20554

Larry Povich*
Federal Communications Commission
Industry Analysis Division
Common Carrier Bureau
2033 M Street, NW, Suite 500
Washington, DC 20554

Rachel B. Ferber
Vice President - Assistant General Counsel
360° Communications Company
8725 Higgins Road
Chicago, IL 60631

Dennis L. Bybee, Ph.D.
Associate Executive Officer
International Society for Technology in Education
USA National Office
P.O. Box 4437
Alexandria, VA 22303
Submitted for Access to Communications for
Education (ACE) Coalition

James S. Blaszak
Kevin S. DiLallo
Levine, Blaszak, Block & Boothby
1300 Connecticut Avenue, NW, Suite 500
Washington, DC 20036
Submitted for Ad Hoc Telecommunications Users
Committee

Kathleen Q. Abernathy
David A. Gross
1818 N Street, NW
Washington, DC 20036
Submitted by Airtouch Communications, Inc.

Mary E. Newmeyer
Federal Affairs Advisor
Alabama Public Service Commission
P. O. Box 991
Montgomery, AL 36101

Mark D. Wilkerson, Esq.
BRANTLEY & WILKERSON, P.C.
P. O. Box 830
Montgomery, AL 36101-0830
Attorneys for The Alabama-Mississippi Telephone
Association

Robert M. Halperin
CROWELL & MORING
1001 Pennsylvania Avenue, NW
Washington, DC 20004
Attorneys for The State of Alaska

Mary Ellen Emmons, President
The Alaska Library Association
P. O. Box 81084
Fairbanks, AK 99708

Don Schroer - Commissioner
Alaska Public Utilities Commission
1016 West Sixth Avenue, Suite 400
Anchorage, AK 99501

James Rowe - Executive Director
Alaska Telephone Association
4341 B Street, Suite 304
Anchorage, AK 99503

Dr. Barbara O'Connor - Chairwoman
Mary Gardiner Jones - President
Alliance for Public Technology
901 15th Street, Suite 230
Washington, DC 20005

Curtis T. White - Managing Partner
Allied Associated Partners, LP GELD Information
Systems
4201 Connecticut Avenue, NW
Washington, DC 20008-1158

Emily M. Williams
Association for Local Telecommunications Services
1200 19th Street, NW
Washington, DC 20036

Leonard J. Kennedy
Todd D. Gray
Kenneth D. Salomon
DOW, LOHNES & ALBERTSON
1200 New Hampshire Avenue, NW, Suite 800
Washington, DC 20036-6802
Attorneys for American Association of Community
Colleges & Association of Community College
Trustees

Kevin J. Donnellan
Acting Director, Legislation and Public Policy
American Association of Retired Persons
601 E Street, NW
Washington, DC 20049

Nancy J. Sharp, MSN, RN
Timothy P. Cox, MS, RN, FNP
American College of Nurse Practitioners
2401 Pennsylvania Avenue, NW, Suite 350
Washington, DC 20037-1718

David J. Stroth
American Federation of Teachers
555 New Jersey Avenue, NW
Washington, DC 20001

Alan Dinsmore
Senior Governmental Relations Representative
American Foundation for the Blind
Governmental Relations Group
1615 M Street, NW, Suite 250
Washington, DC 20036

American Hospital Association
Association of American Medical Colleges
1 N Franklin Street
Chicago, IL 60606

Carol C. Henderson
Executive Director, ALA Washington Office
American Library Association
1301 Pennsylvania Avenue, NW, Suite 403
Washington, DC 20004

Jay Sanders, M.D.
President
American Telemedicine Association
901 15th Street, NW
Washington, DC 20036

Charles H. Helein
Helein & Associates, P.C.
8180 Greensboro Drive
Suite 700
McLean, VA 22102
Attorney for America's Carriers Telecommunication
Association

Michael J. Karson
Attorney for Ameritech
Room 4H88
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025

Bruce D. Jacobs
Glenn S. Richards
Theodore N. Stern
Fisher Wayland Cooper Leader & Zaragoza L.L.P.
2001 Pennsylvania Avenue, NW
Suite 400
Washington, DC 20006
Attorneys for AMSC Subsidiary Corporation

Lynn C. Silver
Education Policy Manager
Apple Computer, Inc.
1667 K Street, NW, Suite 410
Washington, DC 20006

L. Jerry Mitchell
Ardmore Telephone Company
P. O. Box 549
Ardmore, TN 38449

Alison M. Hughes, MPA
Associate Director
The University of Arizona
Health Sciences Center
2501 East Elm Street
Tucson, AZ 85716

Marilyn Mohrman-Gillis - Vice President
Lonna M. Thompson
Policy & Legal Affairs
Association of America's Public Telephone Stations
1350 Connecticut Avenue, NW, Suite 200
Washington, DC 20036

Mark C. Rosenblum
Peter H. Jacoby
Judy Sello
AT&T Corp.
Room 3244J1
295 North Maple Avenue
Basking Ridge, NJ 07920

Charles C. Curtis - Vice President
Cathy J. Quinn - General Manager
Associated Communications & Research Services, Inc.
817 N.E. 63rd Street
Oklahoma City, OK 73105

Lawrence W. Katz
The Bell Atlantic Telephone Companies
1320 North Court House Road, Eighth Floor
Arlington, VA 22201

M. Robert Sutherland
Richard M. Sbaratta
Rebecca M. Lough
Bell South Corporation
1155 Peachtree Street, NE, Suite 1700
Atlanta, GA 30309-3610

Monroe E. Price - Professor of Law
Benjamin N. Cardozo School of Law
Brookdale Center
55 Fifth Avenue
New York, NY 10003

Kevin Taglang
Benton Foundation
1634 Eye Street, NW
Washington, DC 20006

L. Jerry Mitchell
Bledsoe Telephone Cooperative
P.O. Box 609
Pikeville, TN 37367

L. Jerry Mitchell
Blountsville Telephone Company
P. O. Box 1049
Blountsville, AL 35031-1049

David F. Hemmings
Executive Vice President
Brite Voice Systems, Inc.
7309 East 21st Street North
Wichita, KS 67206

Virginia J. Taylor
Richard A. Elbrecht
California Department of Consumer Affairs
400 R Street, Suite 3090
Sacramento, CA 95814-6200

David Price, President
California Library Association
717 K Street, Suite 300
Sacramento, CA 95814-3477

Peter Arth, Jr.
Edward W. O'Neill
Mary Mack Adu
Attorneys for the People of the State of California and
the Public Utilities Commission of the State of
California
505 Van Ness Avenue
San Francisco, CA 94102

Kevin Starr
State Librarian of California
California State Library
Library Court Building
P. O. Box 942837
Sacramento, CA 94237-0001

Michael F. Altschul
Vice President, General Counsel
Cellular Telecommunications Industry Association
1250 Connecticut Avenue, NW, Suite 200
Washington, DC 20036

Richard Civile
The Center for Civic Networking, Inc.
P. O. Box 53152
Washington, DC 20008

Margot Smiley Humphrey
Koteen & Naftalin, L.L.P.
1150 Connecticut Avenue, NW
Suite 1000
Washington, DC 20036
Submitted for Century Telephone Enterprises, Inc. And
TDS Telecommunications Corporation

Cheryl A. Tritt
James A. Casey
MORRISON & FOERSTER, LLP
2000 Pennsylvania Avenue, NW, Suite 5500
Washington, DC 20006
Attorneys for Cheyenne River Sioux Telephone
Authority and Golden West Telecommunications Coop

Churchill County Telephone & Telegraph System
50 W. Williams Avenue
P. O. Box 1390
Fallon, NV 89406

Thomas E. Taylor
Jack B. Harrison
2500 PNC Center
201 East Fifth Street
Cincinnati, OH 45202
Attorneys for Cincinnati Bell Telephone Company

Wayne A. Leighton, PH.D.
James L. Gattuso
Citizens for a Sound Economy Foundation
1250 H. Street, NW, Suite 700
Washington, DC 20005

Richard M. Tettelbaum
Associate General Counsel
Citizens Utilities Company
16th Street, NW, Suite 500
Washington, DC 20036

Norman D. Rasmussen
Executive Vice President
Colorado Independent
Telephone Association, Inc.
3236 Hiwan Drive
Evergreen, CO 80439

David A. Beckett, Esq.
Colorado Public Utilities Commission
1580 Logan Street
Office Level 2
Denver, CO 80203

Ronald L. Plessner
James J. Halpert
Mark J. O'Connor
Piper Marbury L.L.P.
1200 19th Street, NW
Seventh Floor
Washington, DC 20036
Attorneys for Commercial Internet Exchange
Association

Morton Bahr - President
Communications Workers of America
501 3rd Street, NW
Washington, DC 20001-2797

Brad E. Mutschekinaus
Steven A. Augustino
KELLEY DRYE & WARREN
1200 Nineteenth Street, NW, Suite 500
Washington, DC 20036
Attorneys for The Competitive Telecommunications
Association

Randolph J. May
Timothy J. Cooney
SUTHERLAND, ASBILL & BRENNAN
1275 Pennsylvania Avenue, NW
Washington, DC 20004-2404
Attorneys for Compuserve Incorporated

Howard D. Polsky
Robert A. Mansbach
COMSAT Corporation
6560 Rock Spring Drive
Bethesda, MD 20817

Howard J. Symons
Jennifer A. Purvis
Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.
701 Pennsylvania Avenue, NW, Suite 900
Washington, DC 20004
Attorneys for Continental CableVision, Inc.

Michael Casserly, Executive Director
Council of the Great City Schools
1301 Pennsylvania Avenue, NW, Suite 702
Washington, DC 20004

Douglas M. Kenyon, Center Director
Department of Veterans Affairs
Medical and Regional Office Center
Fargo, ND 58102

Roberta Ward, Coordinator
Distance Delivery Consortium
P. O. Box 2401
Bethel, AK 99559

Dr. William J. Tobin - Executive Director
Early Childhood Development Center Legislative
Coalition
3612 Bent Branch Court
Falls Church, VA 22041

Ellis Jacobs
Council for the
Edgemont Neighborhood Coalition
Legal Aid Society of Dayton
333 West First Street, Suite 500
Dayton, OH 45402

Robert C. Heterick, Jr. - President
Educom
1112 16th Street, Suite 600
Washington, DC 20036

Jeffrey F. Beck
Beck & Ackerman
Four Embarcadero Center, Suite 760
San Francisco, CA 94111
Attorneys for Evans Telephone Company, Humboldt
Telephone Company, Kerman Telephone Co., Oregon-
Idaho Utilities, Inc., Pinnacles Telephone Co., The
Ponderosa Telephone Co., The Siskiyou Telephone
Company, The Volcano Telephone Company

L. Jerry Mitchell
Farmers Telephone Cooperative, Inc.
180 McCordy Avenue, North
P. O. Box 217
Rainsville, AL 35986

Jim Williams - Executive Director
FARNET
Washington, Office
1112 16th Street, NW, Suite 600
Washington, DC 20036

Laura L. Wilson
Florida Cable Telecommunications Association, Inc.
310 North Monroe Street
Tallahassee, FL 32301

Cynthia Miller - Senior Attorney
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Fort Mojave Telecommunications, Inc.
P. O. Box 9879
4558 Highway 95, Suite 4
Fort Mojave, AZ 86427

Marc A. Stone
Manager - Regulatory/Legislative Affairs
Fred William & Associates, Inc.
2921 E. 91st Street, Suite 200
Tulsa, OK 74137-3300

Victor A. Hurlbert
Frederick & Warinner, L.L.C.
8400 W. 110th Street, Suite 450
Overland Park, KS 60210

Michael J. Shortley, III
Frontier Corporation
180 South Clinton Avenue
Rochester, NY 14646

Kathy L. Shobert
Director, Federal Affairs
General Communication, Inc.
901 15th Street, NW, Suite 900
Washington, DC 20005

Emily C. Hewitt
Vincent L. Crivella
Michael J. Ettner
General Services Administration
18th & F Streets, NW, Room 4002
Washington, DC 20405

B. B. Knowles, Director
Utilities Division
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334-5701

Carl T. C. Gutierrez
Governor of Guam
P. O. Box 2950
Agana, Guam 96910

Gail L. Polivy
GTE Service Corporation
1850 M Street, NW, Suite 1200
Washington, DC 20036

Philip L. Verveer
Brian A. Finley
WILLKIE FARR & GALLAGHER
1155 21st Street, NW
Washington, DC 20036
Attorneys for the Guam Public Utilities Commission

Veronica M. Ahern
Nixon, Hargrave, Devans & Doyle LLP
One Thomas Circle
Suite 700
Washington, DC 20005
Attorney for Guam Telephone Authority

Kenneth T. Burchett - Vice President
GVNW Inc./Management
P. O. Box 230399
Portland, OR 97281-0399

Harris, Skrivan & Associates, LLC (HSA)
8801 South Yale, Suite 220
Tulsa, OK 74137

Robert A. Hart, IV
Hart Engineers
4615 North Boulevard
Baton Rouge, LA 70806

Lee Green, RN
Clinical Coordinator
High Plains Rural Health Network
218 East Koiwa Avenue
P.O. Box 575
Fort Morgan, CO 80701

Benjamin Perez, Its Attorney
Gerald M Zuckerman, Esq.
Mark J. Becker, Esq.
Hispanic Information and Telecommunications
Network, Inc.
Abacus Communications Company
1801 Columbia Road, NW, Suite 101
Washington, DC 20009

L. Jerry Mitchell
Hopper Telecommunications Company, Inc.
P. O. Box 10
Walnut Grove, AL 35990

Jan F. Reimers - President
ICORE, Inc.
326 S. Second Street
Emmaus, PA 18049

Donald L. Howell, II
Deputy Attorney General
Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720-0074

David W. McGann
Special Assistant Attorney General
Illinois Commerce Commission
160 North LaSalle Street
Chicago, IL 60601

Joseph A. Spagnolo
State Superintendent of Education
Illinois State Board of Education
100 North First Street
Springfield, IL 62777-0001

Deborah C. Costlow
Treg Tremont
WINSTON & STRAWN
1400 L. Street, NW
Washington, DC 20005
Attorneys for Independent Cable &
Telecommunications Association

Indiana Utility Regulatory Commission
302 West Washington Street, Suite 306
Indiana Government Center South
Indianapolis, IN 46204

Ronald Dunn, President
Information Industry Association
1625 Massachusetts Avenue, NW
Suite 700
Washington, DC 20036

Robert D. Carlitz, Executive Director
Information Renaissance
c/o Anthony P. Picadio
Suite 4680
600 Grant Street
Pittsburgh, PA 15219

Joseph P. Markoski
James M. Fink
Squire, Sanders & Dempsey
1201 Pennsylvania Avenue, NW
P. O. Box 407
Washington, DC 20044
Attorneys for Information Technology Association of
America and Electronic Messaging Association

Fiona Branton
Director of Government Relations & Regulatory
Counsel
Information Technology Industry Council
1250 Eye Street, NW
Washington, DC 20005

Chris Dalziel - Executive Director
Instructional Telecommunications Council
One Dupont Circle, NW, Suite 410
Washington, DC 20036

Rodney L. Joyce
Edwin N. Lavergne
J. Thomas Nolan
Ginsburg, Feldman and Bress, Chartered
1250 Connecticut Avenue, NW
Washington, DC 20036
Attorneys for The Interactive Services Association

Brian R. Moir
Moir & Hardman
2000 L. Street, NW
Suite 512
Washington, DC 20036-4907
Attorney for International Communications Association

Harold M. Thompson
Chief Operating Officer
Iowa Communications Network
P. O. Box 587
Johnston, IA 50131-0587

J. Kent Jerome
Secretary - Treasurer
Iowa Telephone Association
1601 - 22 Street, Suite 290
West Des Moines, IA 50266

William H. Smith, Jr., Chief,
Bureau Rate & Safety Evaluation
Iowa Utilities Board
Lucas State Office Building
Des Moines, IA 50319

David A. Irwin
Counsel for ITCs, Inc.
Irwin, Campbell & Tannenwald, P.C.
1730 Rhode Island Avenue, NW
Washington, DC 20036

Michael S. Fox
Director, Regulatory Affairs
John Staurulakis, Inc.
6315 Seabrook Road
Seabrook, MD 20706

Kentucky Department for Libraries and Archives
300 Coffee Tree Road
P. O. Box 537
Frankfort, KY 40602-0537

Amey E. Dougherty, Attorney
Kentucky Public Service Commission
P. O. Box 615
Frankfort, KY 40602

Keystone-Arthur Telephone Company
Fenwick Street
P. O. Box 240
Keystone, NE 69144-0240

Alfred M. Mamlet
Marc A. Paul
STEPTOE & JOHNSON, L.L.P.
1330 Connecticut Avenue, NW
Washington, DC 20036
Attorneys for Kinko's, Inc.

Brad E. Mutschelknaus
John J. Heitmann
KELLEY DRYE & WARREN
1200 19th Street, NW
Washington, DC 20036
Attorneys for LCI International Telecom Corp.

Catherine R. Sloan
Richard L. Fruchterman
Richard S. Whitt
WORLD COM, INC.
d/b/a LDDS WorldCom
1120 Connecticut Avenue, NW
Suite 400
Washington, DC 20036

P. Kenneth Komoski - Founding Director
Learning & Information Networks for Community
Telecomputing
466 Pleasant Street
Melrose, MA 02176-4522

Anne Wendler - Consultant
Lincoln Trail Libraries System
1704 W. Interstate Drive
Champaign, IL 61821

Lawrence C. St. Blanc, Secretary
Gayle T. Kellner, Esq.
Louisiana Public Service Commission
P. O. Box 91154
Baton Rouge, LA 70821-9154

Flo Kallenbach, Technology Coordinator
Maddock Public School District No. 9
P. O. Box G
Maddock, ND 58348-0167

Joel B. Shifman, Esq.
Maine Public Utilities Commission
242 State Street, State House Station No. 18
Augusta, ME 04333-0018
(Joint Comments filed by Maine PUC, Montana PSC,
Nebraska PSC, New Hampshire PUC, New Mexico
SCC, Utah PSC, Vermont DPS/PSB and West Virginia
PSC)

Karen Finstad Hammel, Esq.
Montana Public Service Commission
1701 Prospect Avenue
P.O. Box 202601
Helena, MT 59620-2601
(Joint Comments filed by Maine PUC, Montana PSC,
Nebraska PSC, New Hampshire PUC, New Mexico
SCC, Utah PSC, Vermont DPS/PSB and West Virginia
PSC)

Commissioner Rod Johnson, Chairman
Nebraska Public Service Commission
300 The Atrium, 1200 N Street
P. O. Box 94927
Lincoln, NE 68509-4927
(Joint Comments filed by Maine PUC, Montana PSC,
Nebraska PSC, New Hampshire PUC, New Mexico
SCC, Utah PSC, Vermont DPS/PSB and West Virginia
PSC)

Kathryn M. Bailey
New Hampshire Public Utilities Commission
8 Old Suncook Road
Concord, NH 03301-7319
(Joint Comments filed by Maine PUC, Montana PSC,
Nebraska PSC, New Hampshire PUC, New Mexico
SCC, Utah PSC, Vermont DPS/PSB and West Virginia
PSC)

David M. Kaufman, Esq.
Assistant Attorney General
General Counsel, New Mexico State
Corporation Commission
Post Office Drawer 1508
Santa Fe, NM 87504-1508
(Joint Comments filed by Maine PUC, Montana PSC,
Nebraska PSC, New Hampshire PUC, New Mexico
SCC, Utah PSC, Vermont DPS/PSC and West Virginia
PSC)

David L. Stott, Esq.
Utah Public Service Commission
160 East 300 South
P. O. Box 45585
Salt Lake City, UT 84145
(Joint Comments filed by Maine PUC, Montana PSC,
Nebraska PSC, New Hampshire PUC, New Mexico
SCC, Utah PSC, Vermont DPS/PSC and West Virginia
PSC)

James Volz, Esq.
Vermont Department of Public Service
Drawer 20
Montpelier, VT 05620-2601
(Joint Comments filed by Maine PUC, Montana PSC,
Nebraska PSC, New Hampshire PUC, New Mexico
SCC, Utah PSC, Vermont DPS/PSC and West Virginia
PSC)

Peter M. Bluhm, Esq.
Vermont Public Service Board
Drawer 20
Montpelier, VT 05620-2701
(Joint Comments filed by Maine PUC, Montana PSC,
Nebraska PSC, New Hampshire PUC, New Mexico
SCC, Utah PSC, Vermont DPS/PSC and West Virginia
PSC)

Steven Hamula, Esq.
Public Service Commission of West Virginia
201 Brooks Street
P. O. Box 812
Charleston, WV 25323
(Joint Comments filed by Maine PUC, Montana PSC,
Nebraska PSC, New Hampshire PUC, New Mexico
SCC, Utah PSC, Vermont DPS/PSC and West Virginia
PSC)

Robert C. Maier
Paul J. Kissman
Commonwealth of Massachusetts
Board of Library Commissioners
648 Beacon Street,
Boston, MA 02215

Greg Berberich
Vice President of Government and Regulatory Affairs
Mantanuska Telephone Association, Inc.
1740 South Chugach Street
Palmer, AK 99645

Chris Frentrup
Senior Regulatory Analyst
MCI Telecommunications Corporation
1801 Pennsylvania Avenue, NW
Washington, DC 20036

Mitchell Sprague
Kenneth Matheson
Doris Hammer
The Mendocino Unified School District
P. O. Box 1154
Mendocino, CA 95460

Jeffrey C. Ogden
Merit Associate Director for MichNet
Merit Network
4251 Plymouth Road
Ann Harbor, MI 48105-2785

Henry M. Rivera
Larry S. Solomon
J. Thomas Nolan
Ginsburg, Feldman and Bress, Chartered
1250 Connecticut Avenue, NW
Washington, DC 20036
Attorneys for Metricom, Inc.

Andrew D. Lipman
Mark Sievers
SWIDLER & BERLIN, CHARTERED
3000 K Street, NW, Suite 300
Washington, DC 20007
Attorneys for MFS Communications Company, Inc.

Kathleen F. O'Reilly
Attorney at Law
414 A Street, SE
Washington, DC 20003
Attorney for The Michigan Consumer Federation, The
Oregon Citizens Utility Board (CUB), The
Massachusetts Consumer Association, Chicago Media
Watch, Environmental Media Association, The
Women's Institute for Freedom of the Press, The
Center for Media Literacy, The Greater Washington
Area Chapter of the Cultural Environment Movement,
The Columbus Center for Media Education, Miles
River Press

Margo Crist - Chair, Committee on NIJ/Telecom
Michigan Library Association
University of Michigan
Library Administration
818 Hatcher South
Ann Arbor, MI 48109-1205

Jeffrey P. Johnson
Deputy State Librarian
Library of Michigan
717 W. Allegan Street
Lansing, MI 48909

John G. Strand, Chairman
John C. Shea, Commissioner
David A. Svanda, Commissioner
Michigan Public Service Commission
6545 Mercantile Way
P. O. Box 30221
Lansing, MI 48909-7721

Richard J. Johnson
Brian T. Grogan
MOSS & BARNETT
4800 Norwest Center
90 South Seventh Street
Minneapolis, MN 55402-4129
Attorneys for Minnesota Independent Coalition

Michael J. Nowick
Executive Secretary/Treasurer
Minnesota Telephone Association
1650 World Trade Center
30 East 7th Street
St. Paul, MN 55101-7311

Eric B. Witte
Assistant General Counsel
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

Dr. Stanley Gardner
Barbara Reading
Missouri State Library
P. O. Box 387
Jefferson City, MO 65102

Gene P. Belardi, Vice President
MobileMedia Communications, Inc.
2101 Wilson Boulevard, Suite 935
Arlington, VA 22201

L. Jerry Mitchell
Mon-Cre Telephone Cooperative
P. O. Box 125
Ramer, AL 36069

Michael C. Strand - Executive Vice President
Montana Independent Telecommunications Systems,
Inc.
519 Sanders
P. O. Box 5237
Helena, MT 59604-5237

James F. Ahrens - President
Montana Hospital Association
P. O. Box 5119
Helena, MT 59604

Karen Finstad Hammel
Staff Attorney
Montana Public Service Commission
1701 Prospect Avenue
P. O. Box 202601
Helena, MT 59620-2601

Joan Mandeville - General Manager
Montana Telephone Association
P. O. Box 2166
Great Falls, MT 59403

Robert G. Pennington - Program Director
Mountaineer Doctor TeleVision - MDTV
Robert C. Byrd Health Sciences Center
West Virginia University
Morgantown, WV 26506

Paul Rodgers - General Counsel
Charles D. Gray - Assistant General Counsel
National Association of Regulatory Utility
Commissioners (NARUC)
1201 Constitution Avenue
P. O. Box 6848
Washington, DC 20044

Robert F. Manifold
Assistant Attorney General
Public Counsel Section
Office of Attorney General
900 4th Avenue, Suite 2000
Seattle, WA 98164
Attorney for NASUCA

Jweisi Mfume
President CEO
National Association for the Advancement of Colored
People
4805 Mt. Hope Drive
Baltimore, MD 21215-3297

National Association of Development Organizations
444 North Capitol Street, NW, Suite 630
Washington, DC 20001

Carole Kenner, RNC, DNS, FAAN
President, NANN
National Association of Neonatal Nurses
1304 Southpoint Boulevard
Suite 280
Petaluma, CA 94954-6861

Hon. Albert Vann, member New York State Assembly
The National Black Caucus of State Legislators
Telecommunications & Energy Committee
Legislative Office Building #422
Albany, NY 12248

James R. Hobson
Donelan, Cleary, Wood & Maser, P.C.
1100 New York Avenue, NW, Suite 750
Washington, DC 20005-3934
Attorney for National Emergency Number Association

Don Gilbert, Vice President
Cathy Hotka, Vice President
National Retail Federation
325 7th Street, NW
Suite 1000
Washington, DC 20004

Ronald K. Greenhalgh, Chief Engineer
National Rural Electric Cooperative Association
4301 Wilson Boulevard
Arlington, VA 22203-1860

Nicholas P. Miller
William Malone
Matthew C. Ames
Miller, Canfield, Paddock and Stone, P.L.C.
1225 Nineteenth Street, NW, Suite 400
Washington, DC 20036-2420
Attorneys for the Joint Commenters
(National School Boards Association, American et. al.)

John E. Cawthorne
Vice President for Education
National Urban League
106 Campion Hall
Boston College
Chestnut Hill, MA 02146

Martin Avery - Executive Director
Navajo Nation
1101 17th Street, NW
Suite 250
Washington, DC 20036

Daniel L. Brenner
Neal M. Goldberg
David L. Nicoll
National Cable Television Association, Inc. (NCTA)
1724 Massachusetts Avenue, NW
Washington, DC 20554

Ted Schultz
Vice President for Administrative Services
Nebraska Association of Hospitals and Health Systems
1640 L Street, Suite D
Lincoln, NE 68508-2509

Nebraska Rural Development Commission
P. O. Box 94666
Lincoln, NE 68509-4666

Jeffrey Blumenfeld
Glenn B. Marishin
Christy C. Kunin
Christine A. Mailloux
Blumenfeld & Cohen - Technology Law Group
1615 M Street, NW
Suite 700
Washington, DC 20036
Attorneys for Netscape Communications Corporation

L. Jerry Mitchell
New Hope Telephone Cooperative, Inc.
P. O. Box 452
New Hope, AL 35760

New Jersey Board of Public Utilities
44 South Clinton Avenue
CN-350
Trenton, NJ 08625-0350

Blossom A. Peretz, Esq.
Ratepayer Advocate
State of New Jersey
Division of the Ratepayer Advocate
31 Clinton Street, 11th Floor
P. O. Box 46005
Newark, NJ 07101

Richard Weiner
Assistant Attorney General
New Mexico Attorney General
P. O. Drawer 1508
Santa Fe, NM 87504

David M. Ross, Chair
The Association of the Bar of the City of New York
Committee on Administrative Law
42 W 44 Street
New York, NY 10036

Public Utility Law Project of New York, Inc.
B. Robert Piller, Esq. - Executive Director
Gerald A. Norlander, Esq. - Deputy Director
39 Columbia Street
Albany, NY 12207-2717

Thomas E. Sheldon
New York State Board of Regents and the State
Education Department
Executive Deputy Commissioner of Education
The New York State Education Department
Albany, NY 12234

Joel Blau - Director
Douglas W. Elfiner - Utility Intervenor
Ann Kutter - Deputy Executive Director
NYS Consumer Protection Board
Suite 1020
99 Washington Avenue
Albany, NY 12210

Maureen O. Helmer
General Counsel
New York State Department of Public Service
Three Empire State Plaza
Albany, NY 12223-1350

Ronald A. Gagnon - Executive Director
North of Boston Library Exchange, Inc.
26 Cherry Hill Drive
Danvers, MA 01923

Jon R. Rice, M.D.
State Health Officer
North Dakota Department of Health
600 E. Boulevard Avenue
Bismarck, ND 58505-0200

Illona A. Jeffcoat-Sacco, Director
Public Utilities Division
Public Service Commission
State of North Dakota
State Capitol
600 E. Boulevard
Bismarck, ND 58505-0480

Thomas K. Crowe
Michael B. Adams, Jr.
Law Offices of Thomas K. Crowe, P.C.
2300 M Street, NW
Suite 800
Attorneys for The Commonwealth of the Northern
Mariana Islands

Joseph Di Bella
The NYNEX Telephone Companies
1300 I Street, NW
Suite 400 West
Washington, DC 20005

Gary Meissner, Director of MIS
Eugene Stovall, Telecommunications Consultant
Oakland Unified School District
MIS Department
1025 Second Avenue
Oakland, CA 94606

Dena S. Puskin, Sc.D.
Deputy Director
Office of Rural Health Policy
5600 Fishers Lane, Room 9-05
Rockville, MD 20857

Robert S. Tongren - Consumers' Counsel
Andrea M. Kelsey - Trial Attorney
David C. Bergman
Richard W. Pace, Sr.
Karen J. Hardi
Kathy L. Hagans
Office of the Ohio Consumers' Counsel
77 South High Street - 15th Floor
Columbus, OH 43266-0550

Betty Montgomery - Attorney General of Ohio
Duane Luckey - Section Chief
Steven T. Nourse - Assistant Attorney General
Public Utilities Section
180 East Broad Street
Columbus, OH 43215-3793

Oklahoma Corporation Commission
2101 No. Lincoln Boulevard
Jim Thorpe Office Building
Oklahoma City, OK 73105-4904

Patricia McDermott
Information Policy Analyst
OMB Watch
1742 Connecticut Avenue, NW
Washington, DC 20009-2272

Henry Goldberg
W. Kenneth Ferree
Goldbert, Godles, Wiener & Wright
1229 Nineteenth Street, NW
Washington, DC 20036
Attorneys for OPTEL, Inc.

Richard A. Finnigan
2405 Evergreen Park Drive SW
Suite B-1
Olympia, WA 98502
Attorney for Oregon Independent Telephone
Association and Washington Independent Telephone
Association

Roger Hamilton - Chairman
Ron Eachus - Commissioner
Joan H. Smith - Commissioner
Oregon Public Utility Commission
550 Capitol Street, NE
Salem, OR 97310-1380

Gary M. Epstein
Teresa D. Baer
Michael S. Wroblewski
Latham & Watkins, Suite 1300
1001 Pennsylvania Avenue, NW
Washington, DC 20004
Attorneys for Pacific Telecom, Inc.

Randall E. Cape
Lucille M. Mates
Nancy C. Woolf
Pacific Telesis Group
140 New Montgomery Street, Room 1523
San Francisco, CA 94105

Paul Hoff - General Manager/CEO
Park Region Mutual Telephone Company
100 Main Street
P. O. Box 277
Underwood, MN 56586

Maureen A. Scott - Assistant Counsel
Veronica A. Smith - Deputy Chief Counsel
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

Joe Dudick - Executive Director
Pennsylvania Rural Development Council
Room 506 Finance Building
Harrisburg, PA 17120

Joseph S. Paykel
Andrew Jay Schwartzman
Gigi B. Sohn
Jill A. Lesser
2000 M Street, NW
Washington, DC 20036
Attorneys for Media Access Project and People for the
American Way

Elizabeth A. Noel, Esq.
Sandra Mattavous-Frye
Lynn Janis
Janice Jamison
Office of the People's Counsel of the District of
Columbia
1133 15th Street, NW, Suite 500
Washington, DC 20005

Mark J. Golden - Vice President
Robert R. Cohen
Personal Communications Industry Association
500 Montgomery Street, Suite 700
Alexandria, VA 22314-1561

Bonnie Price
7027 Haverhill Park Rd
Whittier, CA 90602

Public Advocates, Inc.
Mark Savage
Stefan Rosenzweig
Carmela Costellano
1535 Mission Street
San Francisco, CA 94103
Attorneys for National Council of LaRaza, Southern
Christian Leadership Conference, Korean Youth and
Community Center, Filipino Civil Rights Advocates,
Filipinos for Affirmative Action, Association of
Mexican-American Educators, California Association
for Asian-Pacific Bilingual Education, Chicano
Federation of San Diego County, El Proyecto Del
Barrio, Escuela De La Raza Unida, Lawyers'
Committee for Civil Rights of the San Francisco Bay
Area

Joe D. Edge
Richard J. Arsenault
Drinker Biddle & Reath
901 Fifteenth Street, NW
Washington, DC 20005
Attorneys for Puerto Rico Telephone Company

L. Jerry Mitchell
Ragland Telephone Company
P. O. Box 577
Ragland, AL 35131

Judith St. Ledger-Roty
Stefan M. Lopatkiewicz
Reed Smith Shaw & McClay
1301 K Street, NW
East Tower
Washington, DC 20005

Adrienne G. Southgate - General Counsel
State of Rhode Island Public Utilities Commission
100 Orange Street
Providence, RI 02903

Richard W. Riley
U.S. Secretary of Education
600 Independence Avenue, SW
Washington, DC 20202-0100

Boyd D. Spiker, C.E.O.
Rock Port Telephone Company
P. O. Box 147
107 Opp Street
Rock Port, MO 64482

Howard Hunt, President
Rural Iowa Independent Telephone Association
P. O. Box 10
Dixon, IA 52745

Margot Smiley Humphrey
Koteen & Naftalin, L.L.P.
1150 Connecticut Avenue, NW, Suite 1000
Washington, DC 20036
Submitted by NRTA
(Joint Comments filed by The Rural Telephone
Coalition)

David Cosson
L. Marie Guillory
Steve Watkins
NTCA
2626 Pennsylvania Avenue, NW
Washington, DC 20037
(Joint Comments filed by The Rural Telephone
Coalition)

Lisa M. Zaina
Ken Johnson
OPASTCO
21 Dupont Circle, NW, Suite 700
Washington, DC 20036
(Joint Comments filed by The Rural Telephone
Coalition)

Richard B. Bulman
Senior Vice President
Rural Telephone Finance Cooperative
2201 Cooperative Way
Herndon, VA 22071

Wally Beyer - Administrator
Rural Utilities Service
U.S. Department of Agriculture
14 Independence Avenue, SW
Washington, DC 20250-1500

J. Maurice Travillian
Assistant State Superintendent for Libraries
Division of Library and Services
Maryland State Department of Education
200 W. Baltimore Street
Baltimore, MD 21201
(Submitted for Sailor)

Dr. Edward H. Salmon, Commissioner
State of New Jersey
Board of Public Utilities
CN-350
Trenton, NJ 08625-0350